

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

GABRIELA NIEVES;

Plaintiff,

v.

Case No: 1:20-cv-00320-JMS-DML

CARMEL CLAY SCHOOLS, CHRIS
PLUMB, JOHN GOELZ, and RED ROOF
INN,

Defendants.

**DEFENDANT CARMEL CLAY SCHOOLS' MOTION
FOR CONTINUANCE OF PRE-TRIAL CONFERENCE**

Defendant, Carmel Clay Schools ("CCS"), by counsel, respectfully requests that the Court vacate and reschedule the Pre-Trial Conference currently set for April 3, 2020. In support, Defendant states as follows:

1. This case is currently set for a Pre-Trial Conference on April 3, 2020.
2. Unfortunately, counsel for the Defendant CCS, Liberty L. Roberts, has a pre-existing conflict on April 3, 2020. She will be on a previously scheduled vacation from March 26, 2020 till April 4, 2020.
3. The office of the undersigned contacted Plaintiff's counsel and co-counsel on March 2, 2020 advising of the need for this Motion for Continuance. Both indicated they have no objection to this Motion.¹
4. This is the Defendant CCS's first request for a continuance.
5. This Motion is made in good faith and not for the purpose of delay and was filed as soon as the undersigned learned of the conflict.

¹ Defendants Chris Plumb and Red Roof Inn have not retained counsel as of this date. Therefore, undersigned did not contact them regarding their objections to this motion.

WHEREFORE, Carmel Clay Schools, by counsel, respectfully requests that the Pre-Trial Conference currently set for April 3, 2020, be vacated and reset for the next available date on the court's calendar, and for all other just and proper relief.

Respectfully Submitted,

Liberty L. Roberts

Liberty L. Roberts, Atty. No. 23107-49
Attorney for Defendant Carmel Clay Schools
CHURCH CHURCH HITTLE + ANTRIM
Two North Ninth Street
Noblesville, IN 46060

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March 2020, a true and exact copy of the foregoing was filed electronically via the Court's Electronic filing system. Notice of this filing was sent to the following persons by operation of the Court's Electronic filing system.

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The foregoing was also served via U.S. Mail, postage prepaid, upon the parties listed below:

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